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August 30, 2021

VIA ECF

Honorable André M. Espinosa
United States District Court
District of New Jersey
Martin Luther King, Jr. Courthouse
50 Walnut Street
Room 2037, Courtroom 2D
Newark, NJ 07102

**RE: Dotcom Distribution Corp. v.
Travelers Property Casualty Company of America and
The Phoenix Insurance Company
No. 2:20-cv-17871**

Dear Judge Espinosa:

The parties jointly submit this letter in advance of the status conference in the above-referenced matter scheduled for September 2, 2021 at 2:00 pm. Arthur R. Armstrong, Esq., of Flaster Greenberg, P.C., will appear on behalf of Plaintiff Dotcom Distribution Corp. ("Plaintiff" or "Dotcom"). Adam A. Alster, Esq. of Finazzo Cossolini O'Leary Meola & Hager, LLC, will appear on behalf of Defendants Travelers Property and Casualty Company of America and The Phoenix Insurance Company (collectively, "Defendants" or "Travelers").

The Court held a settlement conference on July 22, 2021 via Zoom. The parties were not able to resolve the case at the settlement conference. Settlement negotiations continued after the settlement conference, after Dotcom provided Travelers with the attorney invoices encompassing the attorney work and costs Dotcom believes it is entitled to be reimbursed for. After analyzing the invoices, Travelers increased the offer that was made to Dotcom at the settlement conference. Dotcom rejected the offer and withdrew its settlement demand. Settlement negotiations have ceased.

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The parties initially responded to each other's requests for production of documents on July 6, 2021, by serving written responses. In its written responses to Travelers' requests for production of documents, Plaintiff responded to the majority of document requests by stating that "Plaintiff will produce all responsive, non-privileged documents in its possession, custody or control." On July 6, 2021, Travelers also produced the documents referenced in its written responses to Plaintiff's document requests and Dotcom served its Answers to Interrogatories. Travelers served its Answers to Interrogatories on July 9, 2021. On August 10, 2021, Dotcom produced its attorney invoices in connection with this matter. To date, Dotcom has not produced additional documents in response to Travelers' Request for Production. However, Dotcom has informed Travelers that it is currently the process of gathering and producing the same. Travelers is currently drafting a correspondence to Dotcom outlining the alleged deficiencies in Dotcom's Answers to Interrogatories, Responses to Requests for Production, and document production.

On August 17, 2021, Dotcom sent correspondence to Travelers outlining the alleged deficiencies in Travelers' Answers to Interrogatories, Responses and Objections to Request for Production, and documents produced in response to Dotcom's Request for Production. The parties participated in a meet-and-confer via telephonic conference on August 30, 2021 to discuss the issues outlined in Dotcom's August 17, 2021 letter in accordance with Local Rule 37.1(a). The parties are considering the issues and look forward to either resolving them before the September 2, 2021 status conference or discussing them with Your Honor at the conference.

The parties will proceed to complete written discovery, discovery motions, and depositions in the coming months. The discovery end date is November 1, 2021.

The parties look forward to speaking with Your Honor at the conference later this week. In the meantime, should the Court require any additional information, please let us know.

Respectfully submitted,

FLASTER/GREENBERG P.C.

By: /s/Arthur R. Armstrong

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